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ND-2014-10.C

February 26, 2014

Colleen King
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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

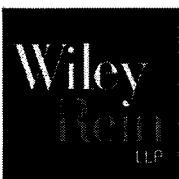
Re: Section 63.71 and 63.19 Application of Telecom Argentina USA, Inc. For
Authority Pursuant to Section 214 of the Communications Act of 1934, to
Discontinue the Provision of Service, WC Docket No. 14-26

Dear Ms. Dortch:

Telecom Argentina USA, Inc. ("Telecom Argentina USA"), by counsel, supplements the above-referenced application to discontinue the provision of retail telecommunications services. As described below, Telecom Argentina USA has provided copies of its discontinuance application to commissions and governors in several additional states.

As described in the pending application, Telecom Argentina USA's pre-paid calling cards are distributed by one distributor via point-of-sale kiosks in Florida and New Jersey and online. Telecom Argentina USA previously provided copies of the application to state commissions and governors in Florida and New Jersey. Due to sale of the cards online, it is possible there are customers located in other U.S. states and territories. Telecom Argentina USA does not have access to or contact information regarding individual customers, but is able to confirm that calls made using pre-paid calling cards had originating numbers that correspond to the following additional states: Alaska, California, Colorado, Connecticut, Georgia, Illinois, Maine, Maryland, Massachusetts, New York, North Carolina, Oregon, Pennsylvania, South Carolina, Texas, Virginia, Wisconsin, Puerto Rico, and the U.S. Virgin Islands. Because there is a possibility customers are located in these states, Telecom Argentina has provided copies of the application to discontinue service to commissions and governors in these states.¹ A copy of the supplemental certificate of service is attached.

¹ See 47 C.F.R. § 63.71(a).



Marlene H. Dortch
February 26, 2014
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Please do not hesitate to contact me if you have any questions.

Respectfully Submitted,

/s/ Colleen King

Colleen King
Counsel for Telecom Argentina USA, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2014, I caused a true and correct copy of the foregoing to be served by first-class mail on the following:

Regulatory Commission of Alaska
701 West Eighth Avenue, Suite 300
Anchorage, AK 99501-3469

The Honorable Sean Parnell
P.O. Box 110001
Juneau, AK 99811-0001

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

The Honorable Jerry Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Colorado Department of Regulatory Agencies
1560 Broadway, Suite 110
Denver, CO 80202

The Honorable John W. Hickenlooper
136 State Capitol
Denver, CO 80203-1792

Connecticut Public Utilities Regulatory
Authority
Ten Franklin Square
New Britain, CT 06051

The Honorable Dannel P. Malloy
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Georgia Public Service Commission
244 Washington Street, SW
Atlanta GA, 30334-9052

The Honorable Nathan Deal
206 Washington Street
Suite 203, State Capitol
Atlanta, GA 30334

Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

The Honorable Pat Quinn
Office of the Governor
207 State House
Springfield, IL 62706

Maine Public Utilities Commission
18 State House Station
Augusta, ME 04333-0018

The Honorable Paul LePage
Office of the Governor
#1 State House Station
Augusta, ME 04333-0001

Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul St., 16th Floor
Baltimore, MD 21202

The Honorable Martin O'Malley
100 State Circle
Annapolis, MD 21401

Massachusetts Department of
Telecommunications and Cable
1000 Washington Street
Suite 820
Boston, MA 02118-6500

The Honorable Deval Patrick
Massachusetts State House
Office of the Governor
Room 105
Boston, MA 02133

New York State Department of Public Service
3 Empire State Plaza
Albany, NY 12223-1350

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

The Honorable Pat McCrory
Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Public Utility Commission of Oregon
P.O. Box 1088
Salem OR 97308-1088

The Honorable John Kitzhaber
160 State Capitol
900 Court Street
Salem, Oregon 97301-4047

Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg , PA 17105-3265

The Honorable Tom Corbett
Office of the Governor
225 Main Capitol Building
Harrisburg, PA 17120

Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29210

The Honorable Nikki Haley
Office of the Governor
1205 Pendleton Street
Columbia, SC 29201

Public Utility Commission of Texas
1701 N. Congress Avenue
PO Box 13326
Austin, TX 78711-3326

The Honorable Rick Perry
Office of the Governor
P.O. Box 12428
Austin, Texas 78711-2428

Virginia State Corporation Commission
Division of Communications
P.O. Box 1197
Richmond, Virginia 23218

The Honorable Terry McAuliffe
1111 East Broad Street
Richmond, VA 23219

Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

The Honorable Scott Walker
115 East Capitol
Madison, WI 53702

Puerto Rico Telecommunications
Regulatory Board
500 Ave. Roberto H. Todd
(Pda. 1.8-Santurce)
San Juan, PR 00907-3981

The Honorable Alejandro Javier García
Padilla
Calle La Fortaleza
San Juan, PR 00901

Virgin Islands Public Service Commission
Barbel Plaza
No.8 Estate Ross, Charlotte Amalie
P.O. BOX 40
St. Thomas, USVI 00804

The Honorable John de Jongh, Jr.
St. Thomas & Water Island
21-22 Kongens Gade
Charlotte Amalie
St. Thomas, USVI 00802

/s/ Pam Conley

Pam Conley

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Section 63.71 and 63.19 Application of)	WC Docket No. _____
Telecom Argentina USA, Inc. For Authority)	
Pursuant to Section 214 of the Communications)	
Act of 1934, to Discontinue the Provision of)	
Service)	

**SECTION 63.71 AND SECTION 63.19 APPLICATION OF
TELECOM ARGENTINA USA, INC.**

Telecom Argentina USA, Inc. ("Telecom Argentina USA") hereby submits this application for authority under Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. § 214, and Sections 63.71 and 63.19 of the Commission's rules, 47 C.F.R. §§ 63.71 and 63.19, to discontinue the provision of retail telecommunications services. In support of this application, Telecom Argentina USA submits the following:

1. Name and Address of Carrier (47 C.F.R. §§ 63.71(a)(1) and (b)(2))

Telecom Argentina USA, Inc.
80 SW 8th Street
Suite 2110
Miami, FL 33130

2. Date of Planned Discontinuance (47 C.F.R. §§ 63.71(a)(2) and (b)(2))

Telecom Argentina USA plans to discontinue its retail telecommunications services as of March 28, 2014, or as soon as possible once the necessary regulatory approvals have been obtained.

3. Points of Geographic Areas of Service Affected (47 C.F.R. §§ 63.71(a)(3) and (b)(2))

Telecom Argentina USA provides a call forwarding service to approximately 600

customers located throughout the United States.

Telecom Argentina USA also provides a pre-paid calling card service. Cards are only distributed by one distributor via point-of-sale kiosks in Florida and New Jersey and online, but can be used to place domestic and international calls throughout the United States.

4. Brief Description of Type of Service Affected (47 C.F.R. §§ 63.71(a)(4) and (b)(2))

Telecom Argentina USA provides two types of telecommunications services: a call forwarding service and a pre-paid calling card service.

Telecom Argentina USA's call forwarding service is an international call forwarding service. Telecom Argentina USA assigns a local number from Argentina, which is automatically forwarded to the number of choice of the customer in the United States. This service allows a customer's relatives from Argentina to reach the customer abroad dialing only a local phone number.

Telecom Argentina USA currently distributes calling cards only in the state of Florida and New Jersey via point-of sale kiosks and online, with one active distributor. These cards can be used anywhere within the United States to place domestic and international calls.

Although at one time Telecom Argentina USA had many customers and higher revenues from its call forwarding and pre-paid calling card services, these businesses have decreased in recent years. Telecom Argentina USA no longer actively markets these services and is not currently investing resources in them. Currently, Telecom Argentina USA provides a call forwarding service to approximately 600 customers. Less than 1,000 pre-paid calling cards are distributed per month.

5. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71(b)(3))

Telecom Argentina USA has written contracts with each of its call forwarding customers.

The company has provided customers written notification of this discontinuance through correspondence sent February 10, 2014. A copy of this customer notification is included as Exhibit A.

Telecom Argentina USA does not sell its calling cards directly to end users. Rather, it sells the cards through a distributor. Each calling card has a user identification number associated with it. The holder of a calling card accesses Telecom Argentina USA's system by calling an 800 number or a local access number and entering his or her identification number, followed by the number to be called. The cost of the call is deducted from the amount that the holder of the calling card has prepaid. The calling cards are sold in denominations of \$2 and \$5. These cards are all sold by one distributor on the Internet or via point-of-sales kiosks.

Section 63.71(a) of the rules requires that domestic carriers either: (1) notify each affected customer of a proposed discontinuance; or (2) show good cause for providing a different form of notice.¹ The Commission previously has recognized that, in the case of prepaid calling card services, there is good cause for using an alternate method to notify customers.² In such cases, the Commission granted has granted applications to discontinue service without requiring prepaid calling card companies to provide written notice to individual customers.³

Telecom Argentina USA has no direct relationship with the end users of its calling cards, and therefore has no means for providing written notice of a discontinuance of service to each end user. As described above, Telecom Argentina USA distributes its calling cards through only one distributor. The company has requested that the distributor cease its sale of any unsold

¹ 47 C.F.R. § 63.71(a).

² See, e.g., *Comments Invited on Application of PLDT Retail, Inc. to Discontinue Domestic Telecommunications Services*, Public Notice, WC Docket No. 05-73, 20 FCC Rcd 4208 (2005); *MCI WorldCom Network Services*, Public Notice, NSD File No. W-P-D-436 (Aug. 6, 1999).

³ *Id.*

cards.

Telecom Argentina USA has established a computer generated message that customers will hear when they call the customer service number available on the cards, alerting them as to the last date that the cards may be used. Customers who have unused funds on their cards after the March 28, 2014 discontinuance date may contact customer service, where they will receive directions on how to return unused cards to receive a full refund. The refund will be either provided as a credit on the customer's credit card or by check sent by mail, based on the customer's preference. Moreover, the prepaid calling card business is extremely competitive and customers will continue to have numerous alternative carriers to provide prepaid calling card services.

Copies of this Application are being sent via first class U.S. Mail to the governors and public service commissions of Florida and New Jersey and the Special Assistant for Telecommunications to the Secretary of Defense. Because Telecom Argentina USA also seeks to discontinue the provision of international services through its international Section 214 authorization, IBFS File No. ITC-214-20010129-00034, copies of this Application are also being sent to the Chief of the International Bureau.

6. Regulatory Classification of Carrier (47 C.F.R. § 63.71(b)(4)):

Telecom Argentina USA is non-dominant with respect to the services that it proposes to discontinue.

Conclusion

For the foregoing reasons, Telecom Argentina USA requests that the Commission, as expeditiously as possible, issue a public notice announcing the filing of Telecom Argentina USA's application to discontinue service, and that, in accordance with its discontinuance procedures, the Commission provide for the application to be granted automatically on the thirty-

first day after the public notice has been released.

Respectfully submitted,

TELECOM ARGENTINA USA, INC.

/s/ Maximo Lema

Maximo Lema
President
Telecom Argentina USA, Inc.
80 SW 8th Street
Suite 2110
Miami, FL 33130

Colleen King
Wiley Rein LLP
1776 K Street, NW
Washington, DC 20006
Tel: 202-719-7307
cking@wileyrein.com

Dated: February 11, 2014

EXHIBIT A

Dear Customer,

This letter will serve as formal notice that Telecom Argentina USA, Inc. will discontinue its Call Forwarding Services provided under the commercial names Me Llamas, Me Llamas Premium, Find Me, and Te Llamo on March 28, 2014.

Telecom Argentina USA, Inc. is providing you with notice of our discontinuance of service in order to ensure that you will have ample time to make other arrangements for replacement service. Please note that this service will not be transferred automatically to another carrier. In order for you to maintain uninterrupted service, you must make arrangements with an alternative service provider well in advance of the termination date. You should begin that process immediately.

We provide below a list of alternative service providers that may be available to replace our service. Telecom Argentina USA, Inc. does not endorse or recommend any particular service provider. Telecom Argentina USA, Inc. provides this information only to assist you, but does not control or guarantee and is not responsible for the accuracy, relevance, timeliness, or completeness of information or services provided by these providers. We strongly recommend that you review each offer carefully:

Orbitel USA / Tel: 1 (800) 875 0686
Telehispanic Services / Tel: 1 (866) 897-8520
Llamada Directa / Tel: 1 (866) 505 2985

The Federal Communications Commission ("FCC") will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the FCC releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Telecom Argentina USA, Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

If you have any questions, please contact Telecom Argentina USA, Inc.:

Telecom Argentina USA, Inc.

80 SW 8th Street

Suite 2110

Miami, FL 33130

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2014, I caused a true and correct copy of the foregoing to be served by first-class mail on the following:

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

The Honorable Rick Scott
State of Florida
The Capitol
400 S. Monroe St.
Tallahassee, FL 32399-0001

New Jersey Board of Public Utilities
44 S. Clinton Avenue
Trenton, NJ 08625

The Honorable Chris Christie
Office of the Governor
PO Box 001
Trenton, NJ 08625

Secretary of Defense
Attn: Special Assistant for Telecommunications
Pentagon
Washington, DC 20301

Mindel De La Torre
Chief, International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

/s/ Pam Conley

Pam Conley